



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street, 3rd floor  
New York, New York 10007*

February 18, 2025

**BY ECF**

The Honorable Analisa Torres  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Estate of Tamar Kedem Siman Tov, et al. v. UNRWA,  
et al.*, 24 Civ. 4765 (AT)

Dear Judge Torres:

I write respectfully on behalf of the United States of America (the “Government”), which is not a party to the above-referenced action, to request that the Court delay ruling on the immunity of the defendants in this action until the Government has had time to review the position it has taken concerning the same.

As background, on July 30, 2024, the Government filed a letter in the above-captioned action brought against the United Nations Relief and Works Agency (“UNRWA”) and several current and former United Nations officials, pursuant to 28 U.S.C. § 517. (ECF No. 17). In the July 30 letter, the Government provided its view of the application in this case of the immunities of the United Nations and its officials. (*See id.*). On September 13, 2024, the plaintiffs filed a brief in opposition to the Government’s letter. (ECF No. 25). The Government filed a supplemental letter on October 18, 2024. (ECF No. 38).

On December 16, 2024, the defendants filed a motion to dismiss the complaint. (ECF No. 49). The defendants’ brief echoes several of the views that were expressed in the Government’s letters. (*See* ECF No. 50). The plaintiffs opposed the defendants’ motion on January 13, 2025 (ECF No. 53), and the defendants filed a reply brief on January 21, 2025 (ECF No. 55). Thus, the defendants’ motion to dismiss is currently fully briefed and pending before the Court.

The Government is currently reviewing the views expressed in the July 30 and October 18, 2024 letters. For that reason, the Government respectfully requests that the Court defer taking any action concerning the immunities of the defendants until the Government has had time to complete this review. The Government respectfully requests

the Court's leave to provide an update in sixty days, by April 21, 2025, regarding its review process.

Thank you for your consideration of this request.

Respectfully,

MATTHEW PODOLSKY  
Acting United States Attorney

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